



THE CITY OF NEW YORK
LAW DEPARTMENT
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BY ECF

Hon. Robert W. Sweet
United States District Judge
Southern District of New York

Re: Dolcine v. City of New York et al.,
17 Civ. 4835 (RWS)

Dear Judge Sweet:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent Defendants Kerin Donahue and Richard Hanson in the above-referenced action. I write to respectfully request an extension of time to respond to the First Amended Complaint (“FAC”) in this action.

On June 1, 2018, Defendants Donahue and Hanson requested a first extension of time to respond to the FAC, and the Court granted the request. See ECF No. 26 & 27 (setting Defendants Donahue and Hanson’s deadline to respond as July 6, 2018). On June 22, 2018, the Court issued summonses for Defendants Tomeka Ruffin and Christopher Derenze. See ECF No. 30 & 31. Plaintiff’s counsel represents that service is forthcoming as to Defendants Ruffin and Derenze at this time. Pending proper service upon Defendants Ruffin and Derenze, this Office would require additional time to conduct individual representation interviews in order to determine the Office’s ability to represent those defendants pursuant to N.Y. Gen. Municipal Law § 50(k).

Pending proper service upon remaining defendants and this Office’s decision to represent those defendants after the § 50(k) representation process, this Office respectfully seeks to file a unified response to the FAC. Defendants’ ability to file a unified response would conserve the resources of both the parties and the Court, and would be in the interest of judicial economy. To that extent, Defendants Donahue and Hanson respectfully request three additional weeks, until July 27, 2018, to file a response to the FAC. This is the second extension request for Defendants Donahue and Hanson with respect to responding to the FAC, and the Court granted the previous request. Plaintiff consents to this extension, and this extension affects no other scheduled dates.

I thank the Court for its consideration of the foregoing request.

Respectfully submitted,

/s/

John Corbin Carter
Assistant Corporation Counsel

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